

November 24, 1997

Mr. Lester A. Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Lester:

The environmental, urban, and agricultural communities are deeply concerned about the current status of the Ecosystem Restoration Program Plan (ERPP). While the draft ERPP contains many positive elements, there is almost universal agreement among the stakeholders that it does not cohere as a planning document and does not, in its current form, provide a necessary foundation for a long-term CALFED solution. Many substantial problems have been identified, both by the recently convened Scientific Review Panel as well as by a variety of stakeholders. These problems can not be ignored or avoided. We support the findings of the Scientific Review Panel. The purpose of this letter is to make you aware of our shared concerns and to offer our recommendations and help for advancing the program.

CALFED staff have worked extremely hard on the draft ERPP. The stakeholders recognize and appreciate this dedicated effort. We also appreciate as well that CALFED has set itself a difficult and complex task. However, what has been missing from the efforts to date is not dedication or ability, but the application of expertise in specific areas crucial to the success of the ERPP. One of our key concerns is a lack of integration in relating one piece of the proposed program to another, and in translating the desire for a system based approach into reality. Accomplishing this requires specialized experience in large scale interdisciplinary restoration planning. We offer three key recommendations that, if implemented in earnest, would put the ERPP on track for success.

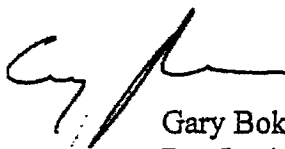
1. Develop a Strategic Plan. In the rush to develop a program with tangible targets and specific actions, the ERPP has focused almost exclusively on development of an implementation menu without a strategic context. We recommend that a new document be developed (working as closely as possible with outside scientific reviewers and with stakeholders) which provides a more comprehensive and supportable framework for the program that can be incorporated directly into the EIR/EIS. The key purposes of this strategic plan would be to:
 - clarify goals, objectives, and measurement systems
 - establish conceptual models for testing management hypotheses
 - determine how to prioritize actions.


The Scientific Review Panel concluded that all of these components were missing from the current draft ERPP. The specific actions contained in Volumes 1 and 2 of the draft ERPP would be reviewed, revised, and reorganized to be consistent with the Strategic Plan. We understand that you are pursuing such an approach for incorporation into the DEIR/EIS.


2. **Incorporate Meaningful Outside Technical Involvement.** To date, the ERPP has been largely developed through an internal process of drafting and review. A vigorous, open, technical process which involves significant participation by independent scientific reviewers and by stakeholder experts is essential and needs to be included in the process to improve the likelihood for long-term success. This could be accomplished in a variety of ways, including focused, small-group, interdisciplinary technical workshops. The use of invited participants to address key issues in the development of a planning framework has worked effectively in other situations.
3. **Seek Additional Expertise.** The program would benefit from additional expertise, particularly in the form of a nationally recognized interdisciplinary environmental planner. The program needs both a very broad thinker that could focus and coordinate the effort, as well as additional expertise in the following areas: indicator development, ecological modeling, hydrology and geomorphology, and endangered species regulatory compliance. This expertise could be enlisted through consultant contracts or partnerships with stakeholders and does not have to involve additional full time staff positions. However, given the urgency of the need, this expertise should be brought in immediately. Furthermore, we have already benefited greatly from the participation of the Scientific Review Panel and they should continue to be engaged. We collectively believe that significant, fundamental changes to the ERPP are necessary. We do not believe that time and energy should be expended in simply revising the draft ERPP as it is currently written. Rather, we are advocating some significant changes now if we hope to establish a workable, well supported, long-term ecosystem program. Above all, we support your development of a strategic plan to be incorporated into the EIR/EIS document.

While there is some concern regarding the current schedule, we are committed to working together to ensure a solid foundation and strongly encourage you to implement the recommendations contained in this letter. While additional resources will be necessary from CALFED and the stakeholders, both for you and for us, we believe it is fundamental to our collective success.

Sincerely,


Gary Boker
Bay Institute


Byron Buck
CUWA


Jason Peltier
CVPWA